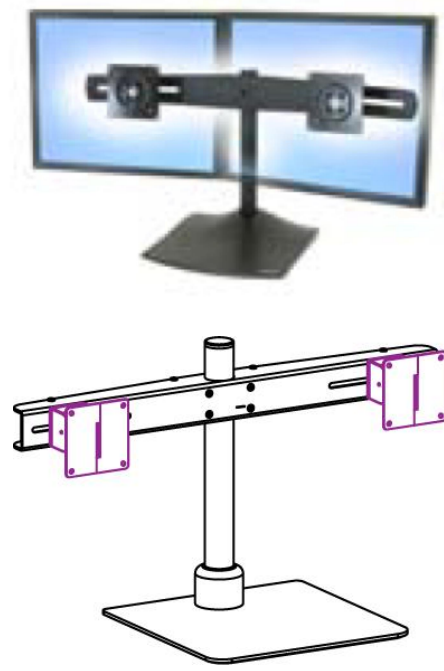
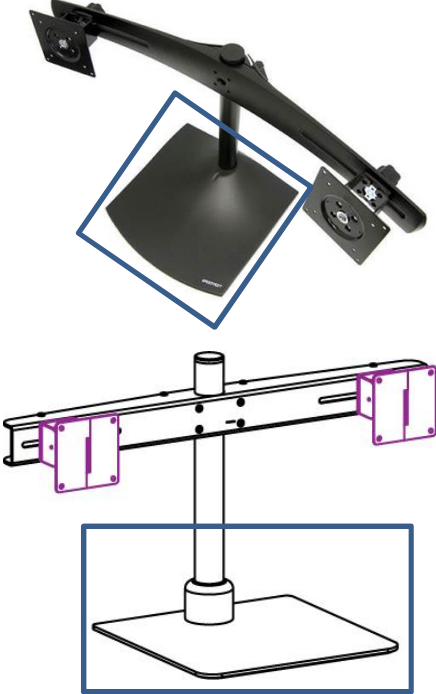



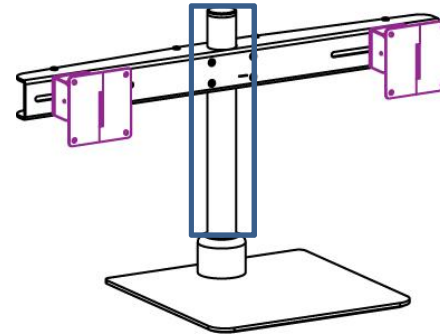
EXHIBIT 2: US 8,102,331

I. ERGOTRON DS-100

Claim 1	Ergotron DS-100 Product (hereinafter “DS-100”) ¹
A display system comprising:	<p>The DS-100 is a display system.</p> 
a base;	The DS-100 includes a base.

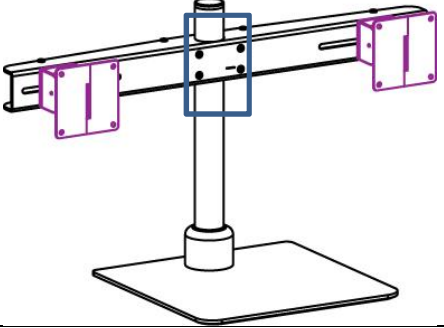

¹ The illustrations of the Ergotron DS-100 are merely representative of the feature and functionalities exhibited by the DS-100 Product, including various configurations thereof, sold and used in the United States and/or invented in this country, before the alleged invention claimed in the ‘331 patent, without being abandoned, suppressed, or concealed.

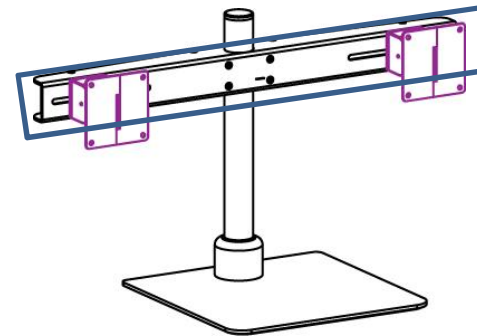
	
<p>a support column connected to the base and having a mounting portion extending in a vertical direction away from the base when the base is disposed on a horizontal surface;</p>	<p>The DS-100 has a support column connected to the base.</p> 



To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting portion is a portion of a support column to which the support arm mounts. The DS-100 has a portion of a support column to which a support arm mounts. The mounting portion extends in a vertical direction away from the base when the base is disposed on a horizontal surface.



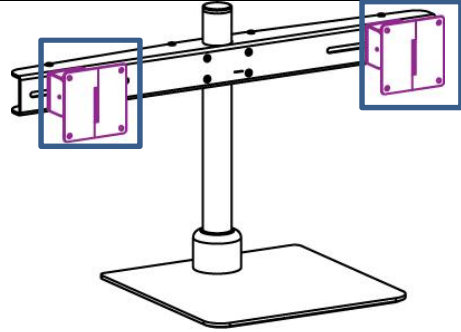

	
<p>a support arm structure secured to the support column, the support arm structure having a single piece support arm that extends on either side of the support column and that has a longitudinal length that is longer than the width of the base; and</p>	<p>The DS-100 has a support arm structure secured to the support column, the support arm structure having a single piece support arm that extends on either side of the support column and that has a longitudinal length that is longer than the width of the base.</p> 

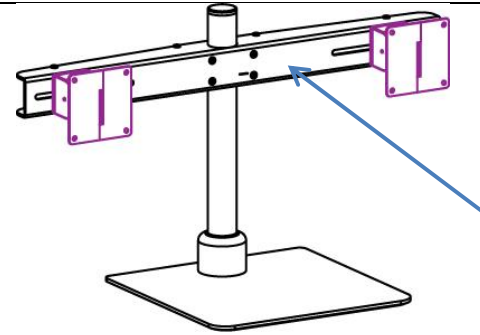


at least two connectors for connecting display housing portions at the backs of at least two displays to the support arm, such that at least a part of the support column is disposed behind the at least two displays,

The DS-100 has at least two connectors for connecting display housing portions at the backs of at least two displays to the support arm, such that at least a part of the support column is disposed behind the at least two displays,



	
<p>wherein: the support arm is a) bowed at the front of the support arm so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays,</p>	<p>The support arm of at least one configuration of the DS-100 is bowed at the front of the support arm so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays</p>  <p>To the extent a version of the DS-100 does not have a support arm that is bowed at the front, the DS-100 at least has a straight support arm facing a user.</p>



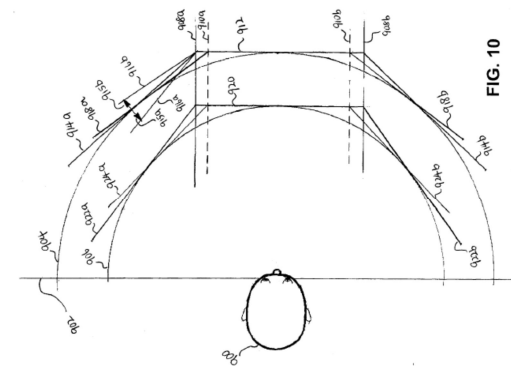
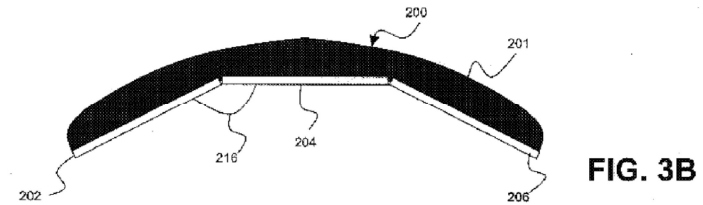
It would have been obvious for a person of ordinary skill in the art to have modified the support arm of the DS-100 such that the support arm is bowed at the front of the support arm so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays. Such a modification would have been a mere design choice that would have been obvious according to known methods to yield predictable results. For example, it would have been obvious to have modified the straight arm version of DS-100 in view of one or more of the following secondary references to yield a support arm that is bowed at the front of the support arm so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays:

Secondary References

(1) US Patent No. 6,690,337 (hereinafter “the ‘337 patent”)

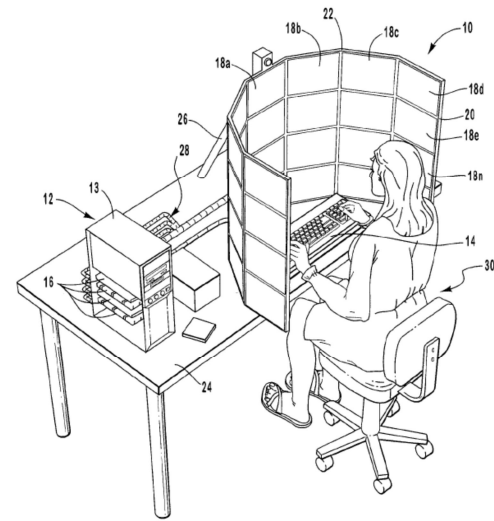
The ‘337 patent relates to a multi-panel video display system having a plurality of displays that are arranged so the display panels are substantially equidistant from an eye point of a user. The patent discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user

positioned in front of and viewing the displays. For example, the display panels are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. (column 2, lines 30-60).



(2) WO 99/39328 (hereinafter “the ‘328 publication”)

The ‘328 publication describes a multi-screen display system that includes a plurality of display screens that are concave in shape about a user. (Abstract). The publication discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.



(3) US 6,020,890 (hereinafter “the ‘890 patent”)

The ‘890 patent discloses a two-dimensional image display device that includes a curved display system wrapping about a user. The patent discloses that the display system is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.

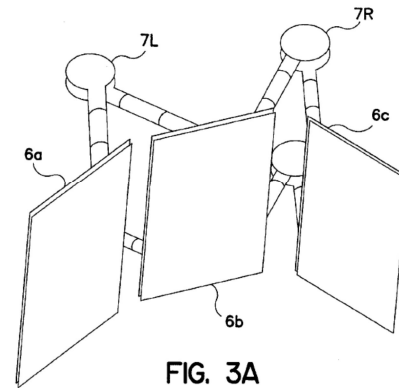
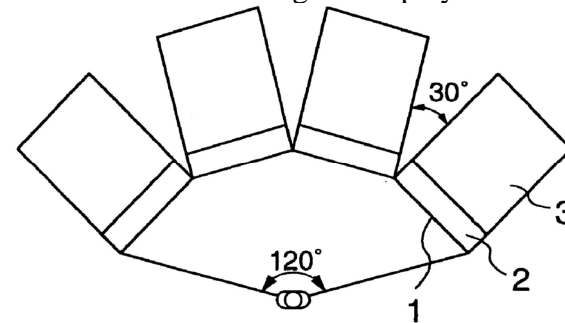
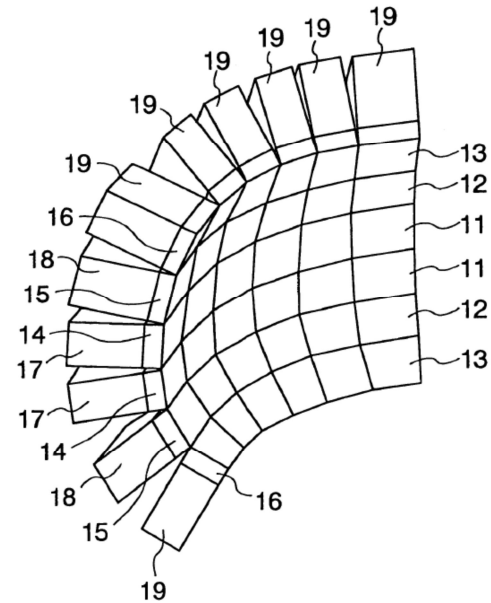


FIG. 3A

(4) US 5,926,153 (hereinafter “the ‘153 patent”)

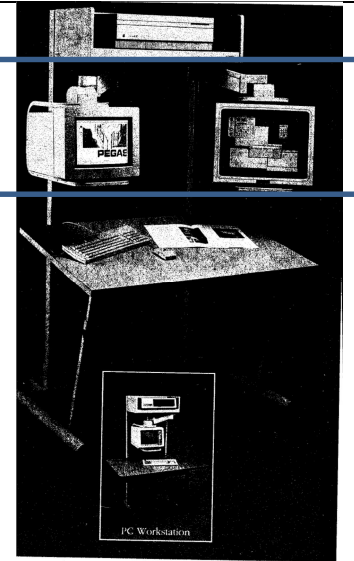
The ‘153 patent discloses a multi-display apparatus that arranges display devices across a concave surface both in a horizontal visibility angle direction and a vertical visibility angle direction. The patent discloses that the display devices are bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.





(5) The Ergotron Ergonomic Computer Workstations Component Product Catalog (hereinafter the “Ergotron Design Station”)

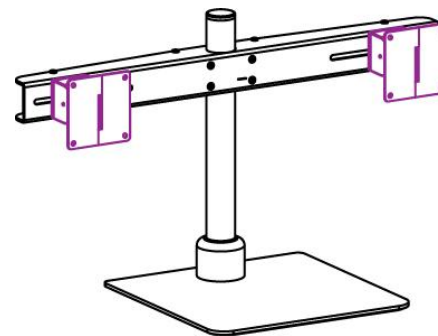
The Ergotron Design Station discloses a display system that has a support arm assembly that is bowed at the front of the support arm assembly so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays.



b) adapted to support all of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm, and c) substantially horizontal in use,

The support arm of the DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, and the Ergotron Design Station, is adapted to support all of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm, and substantially horizontal in use.

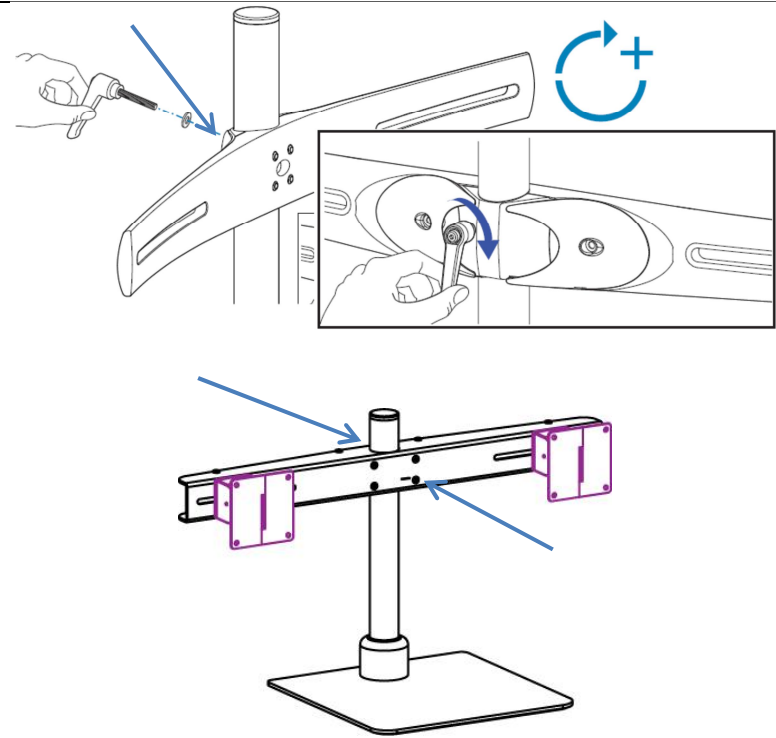




the support arm structure further comprising a mounting member with a hole and at least one aperture,

To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting member with a hole and at least one aperture is a clamp that goes over a pole and has an opening for a tightening screw. The DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, and the Ergotron Design Station, has a clamp that goes over a pole and has an opening for a tightening screw.



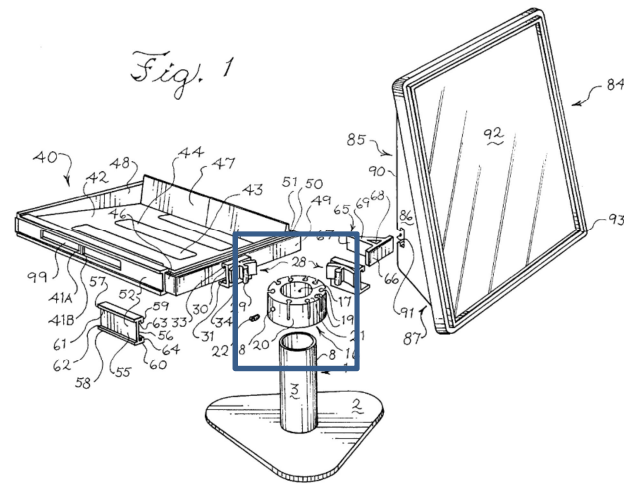


Moreover, to the extent the DS-100 does not have a clamp that goes over a pole and an opening for a tightening screw, such a feature would have been obvious to a person of ordinary skill in the art. For example, it would have been obvious to have modified the DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, and the Ergotron Design Station to include a clamp that goes over a pole and an opening for a tightening screw.

Secondary Reference

US 6,010,017 (hereinafter “the ‘017 patent”)

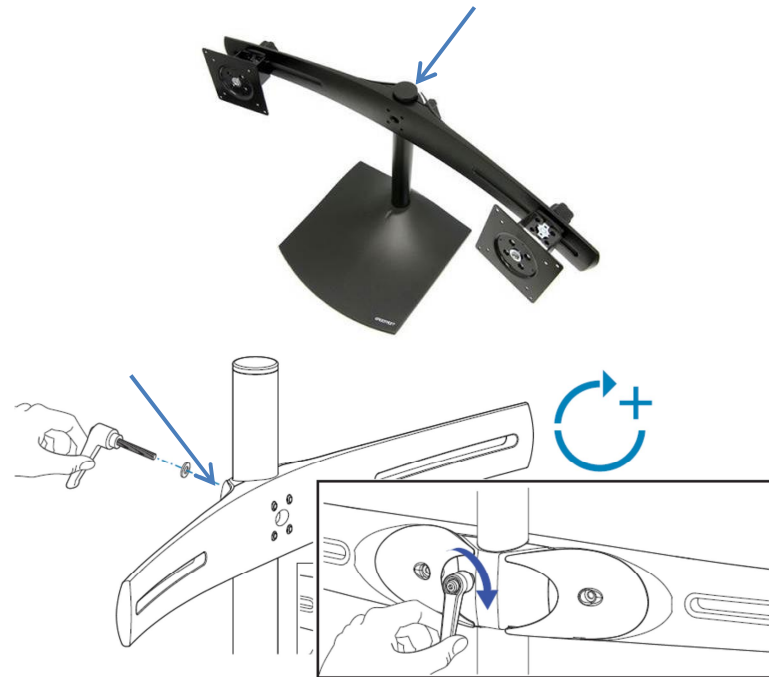
The ‘017 patent describes a display system having a foundational unit. With respect to FIG. 1, the reference describes the foundational unit 1 comprised of a base 2 and column 3. A supporting collar 16 can slip over the column 3 and is mounted to the column by means of a screw.

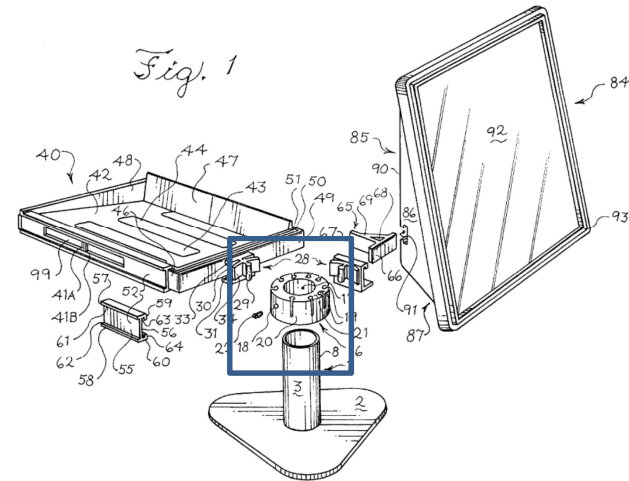
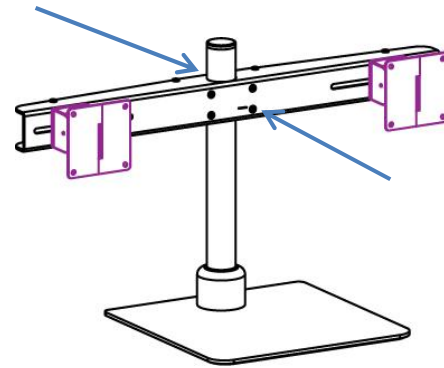


such that the support arm structure, and the single piece support arm thereof, is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and

The support arm structure of the DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the ‘337 patent, the ‘328 publication, the ‘890 patent, the ‘153 patent, the Ergotron Design Station, and the ‘017 patent further includes a mounting member with a hole and at least one aperture (*a clamp that goes over a pole and has an opening for a tightening screw*) such that the support arm structure, and single piece support arm thereof, is secured to the

support column through the mounting member by an acceptance of the mounting portion of the support column into the hole. For example,

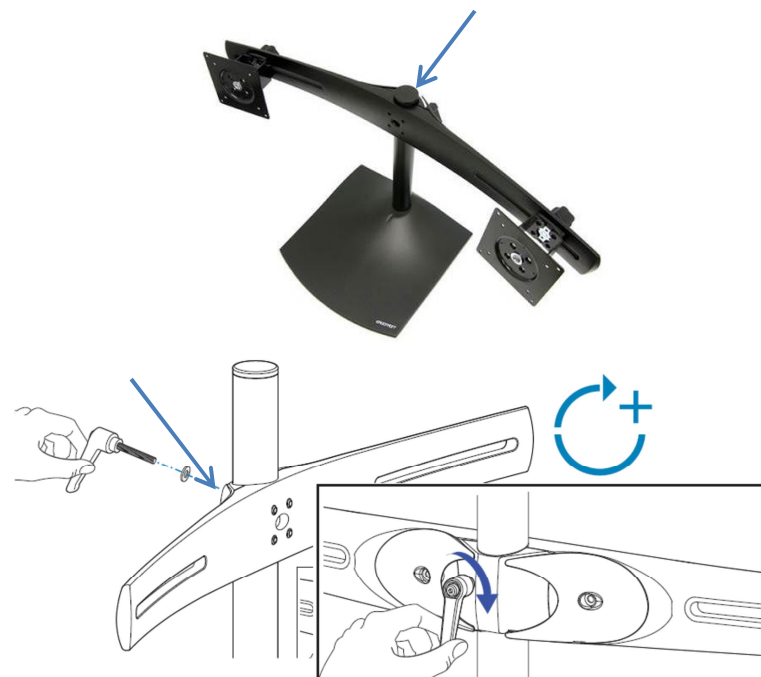


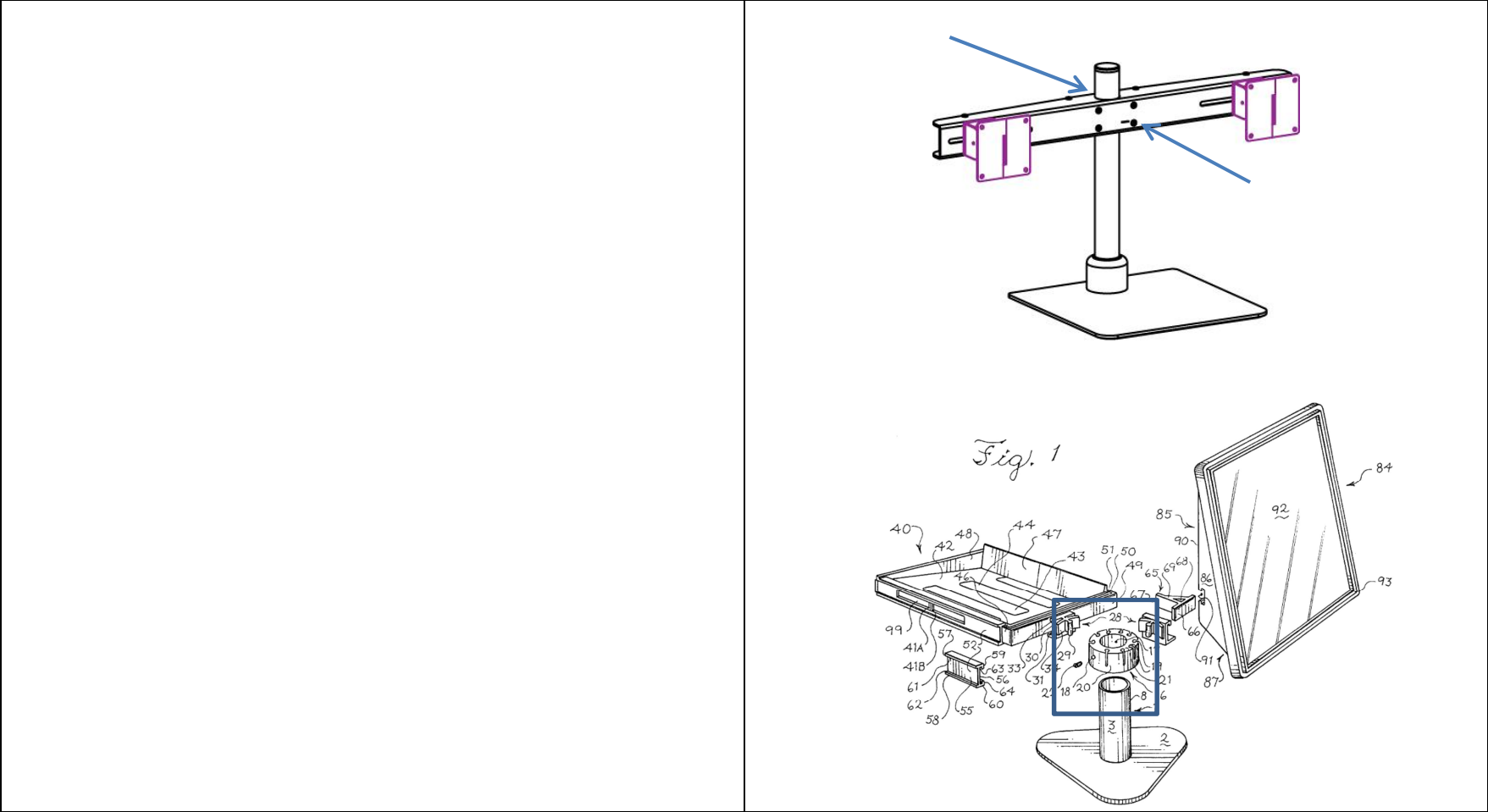



by at least one external fastening element that engages with the at least one aperture.

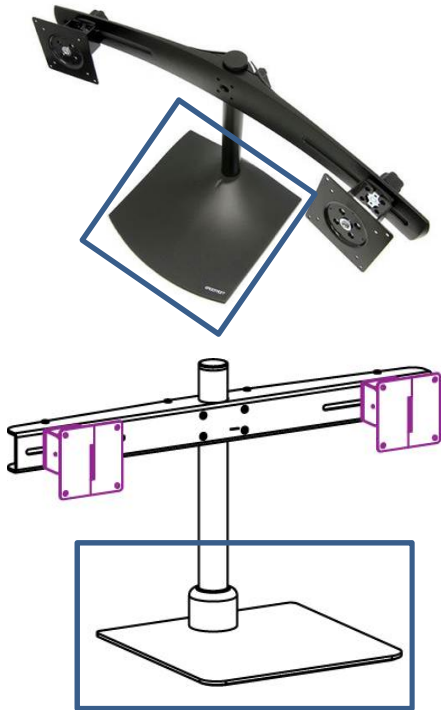
The support arm structure of the DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, and the '017 patent further includes a mounting member with a hole and at least one aperture (*a clamp that goes over a pole and has an opening for a tightening screw*) such that the support arm

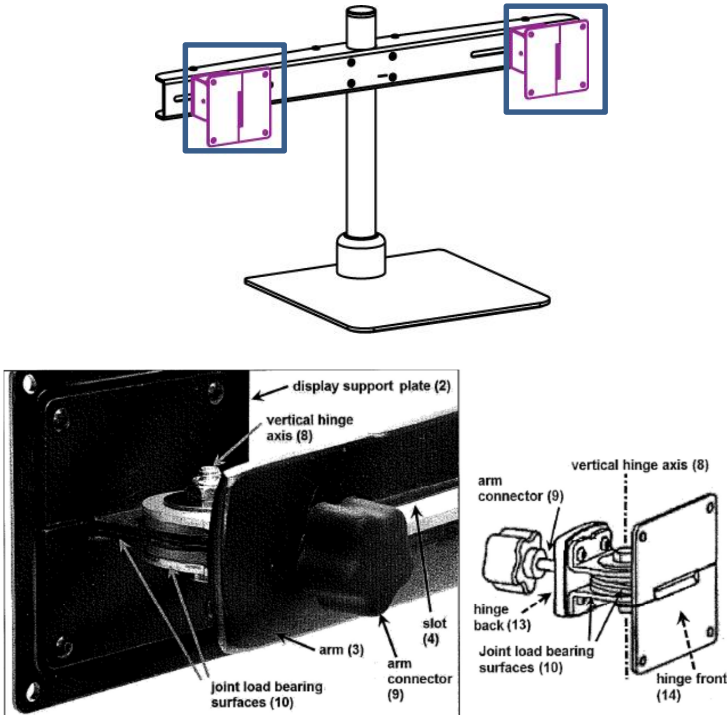
structure, and single piece support arm thereof, is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and by at least one external fastening element that engages with the at least one aperture. For example,

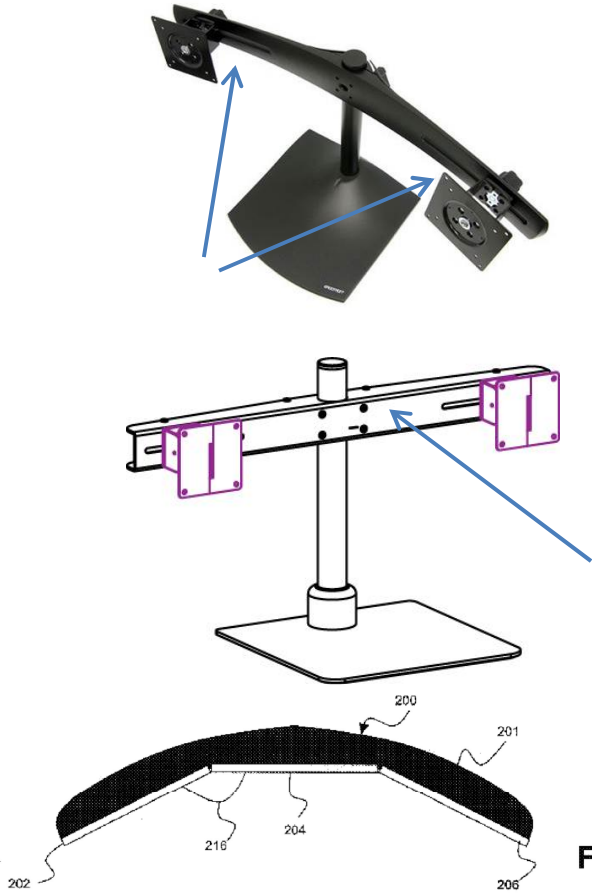


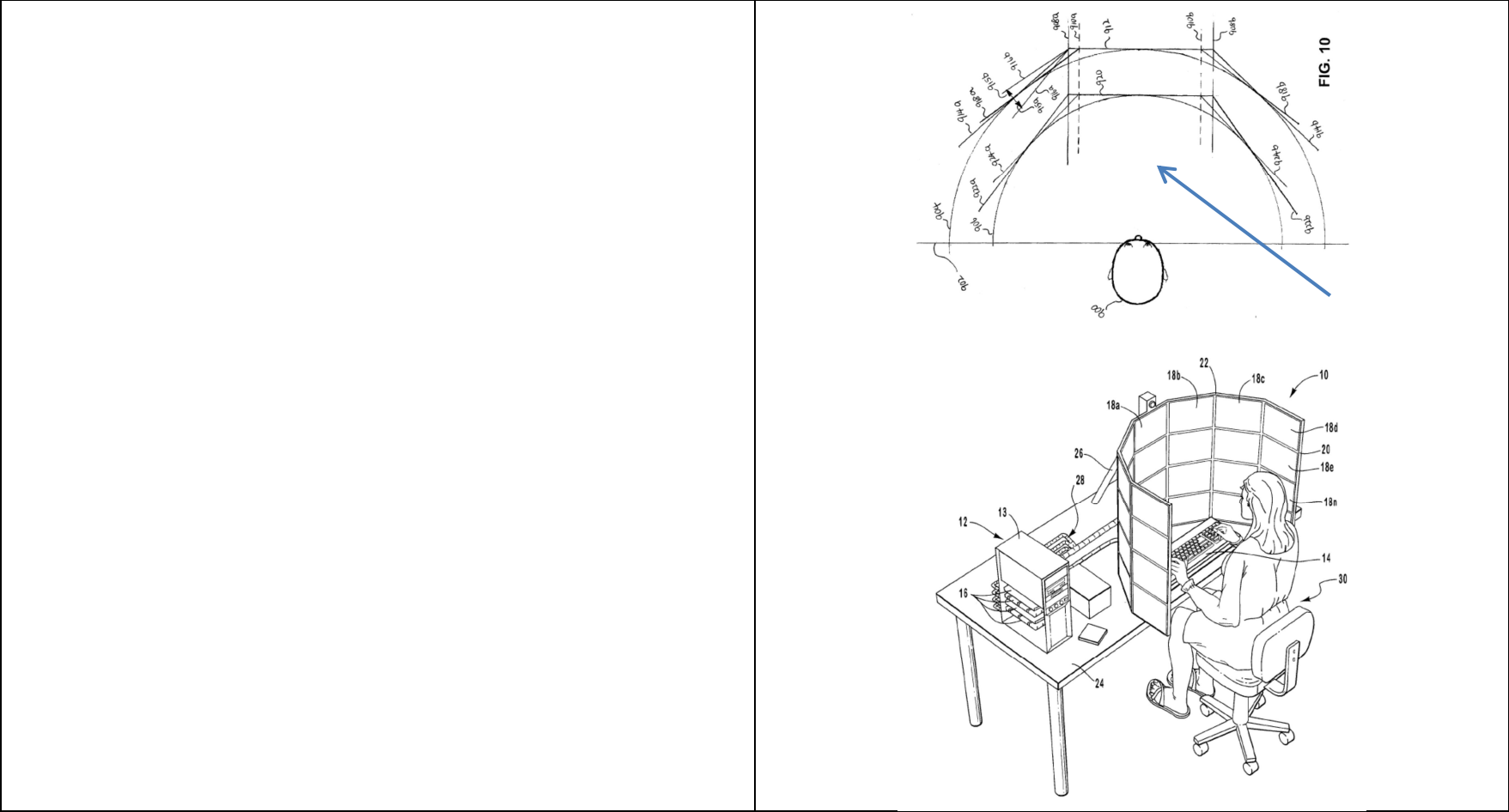


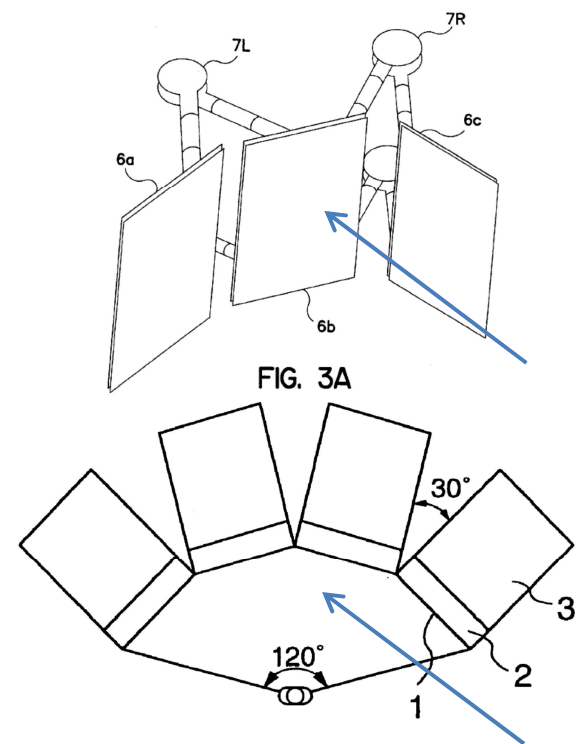
Claim 2	Ergotron DS-100 Product
<p>The display system of claim 1, further comprising the at least two displays.</p>	<p>The DS-100 further comprises the at least two displays.</p> 

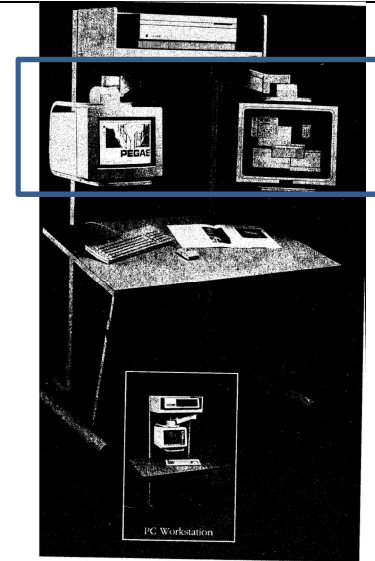
Claim 3	Ergotron DS-100 Product
<p>The display system of claim 1, wherein the base is adapted to rest on a flat and horizontal work surface.</p>	<p>The base of the DS-100 is adapted to rest on a flat and horizontal work surface.</p> 

Claim 4	Ergotron DS-100 Product
<p data-bbox="195 155 1041 256">The display system of claim 3, wherein at least two of the connectors permit two of the displays to angle independently.</p>	<p data-bbox="1062 188 1871 256">The DS-100 has at least two connectors that permit two of the displays to angle independently.</p> <div data-bbox="1121 326 1843 1036"><p>The technical drawings illustrate the Ergotron DS-100 product. The top drawing is a perspective view of the product, showing a horizontal arm mounted on a vertical post, which is attached to a square base. Two rectangular display support plates are mounted on the arm, each highlighted with a blue box. The bottom left drawing is a close-up view of the arm connector (9) and the joint load bearing surfaces (10). It shows the arm (3) and the slot (4) in the arm connector. The bottom right drawing is a side view of the arm connector (9) and the joint load bearing surfaces (10), showing the hinge back (13) and the hinge front (14). The vertical hinge axis (8) is also indicated.</p></div>

Claim 5	Ergotron DS-100 Product
<p>The display system of claim 1, wherein the support arm is bowed at the front oldie arm,</p>	<p>The support arm of the DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent and the Ergotron Design Station, is bowed at the front of the arm.</p>  <p>FIG. 3B</p>







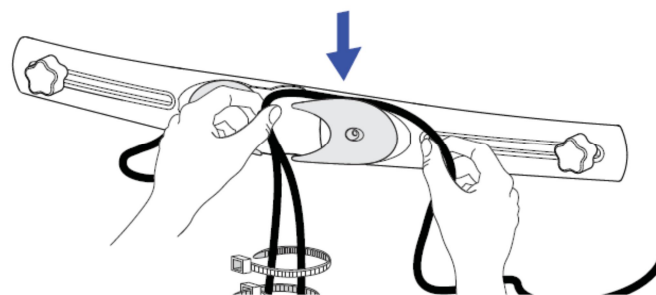
the support arm having a radius of curvature in the range of 24-36 inches.

The support arm of the DS-100 has a radius of curvature in the range of 24-36 inches



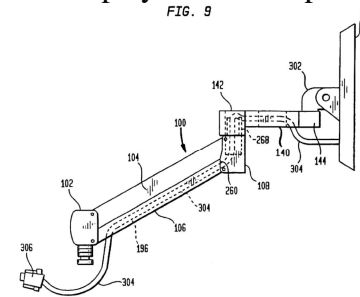
In addition, configuring the support arm to have a radius of curvature in the range of 24-36 inches would have been a mere design choice that would have been obvious according to known methods to yield predictable results. For example, it would have

	<p>been obvious to modified the DS-100 in view of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent and the Ergotron Design Station to yield a radius of curvature in the range of 24-36 inches. In particular, the display panels of the '337 patent are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. This range overlaps with the claimed range.</p>
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Claim 6	Ergotron DS-100 Product
<p>The display system of claim 4, wherein the support arm includes a channel within which cables for the displays can be disposed.</p>	<p>The support arm of the DS-100 includes a channel within which cables for the displays can be disposed.</p>  <p>To the extent the DS-100 does not include a support channel within which cables for the displays can be disposed, such a feature would have been obvious to a person of ordinary skill in the art.</p> <p>For example, it would have been obvious to have modified the support arm of any configuration of the DS-100 to include a channel within which cables for the displays can be disposed.</p> <p><u>Secondary References</u></p>

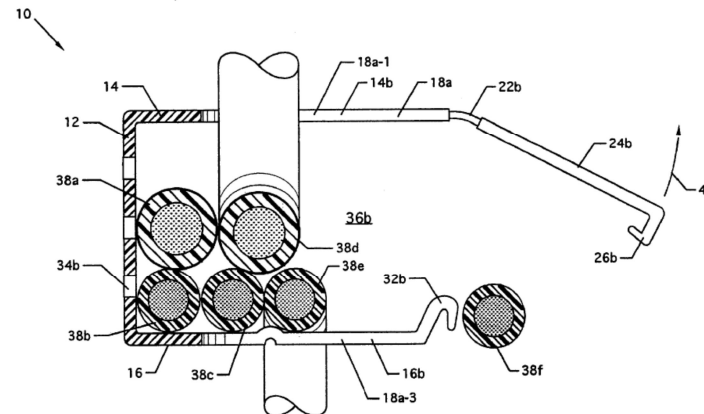
(1) US 6,409,134 (hereinafter “the ‘134 patent”)

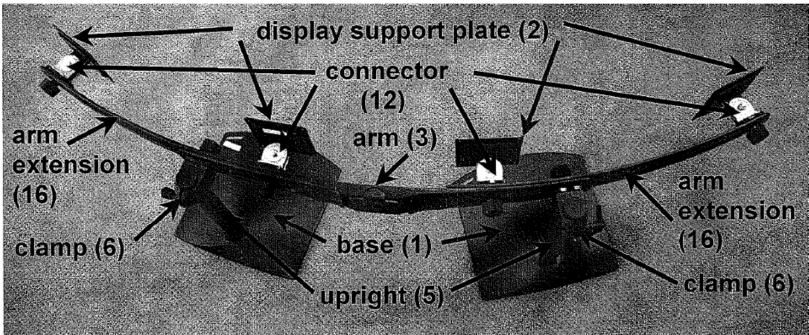
The ‘134 patent relates to an arm apparatus for mounting electronic device and includes a support arm having a channel within which cables for displays can be disposed.



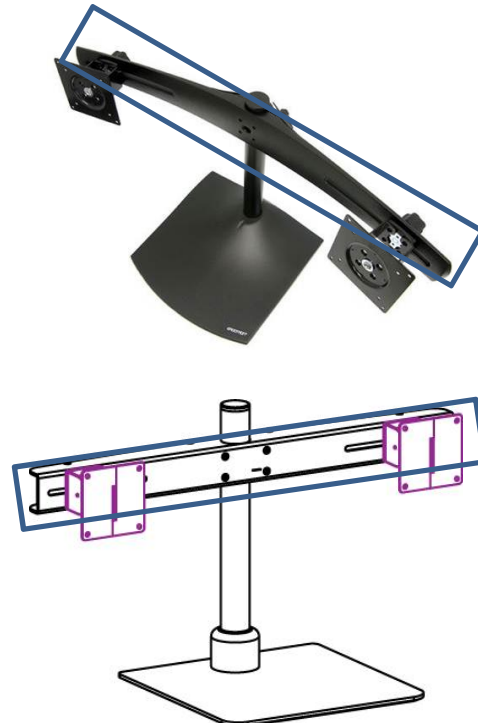
(2) US 6,380,484 (hereinafter “the ‘484 patent”)

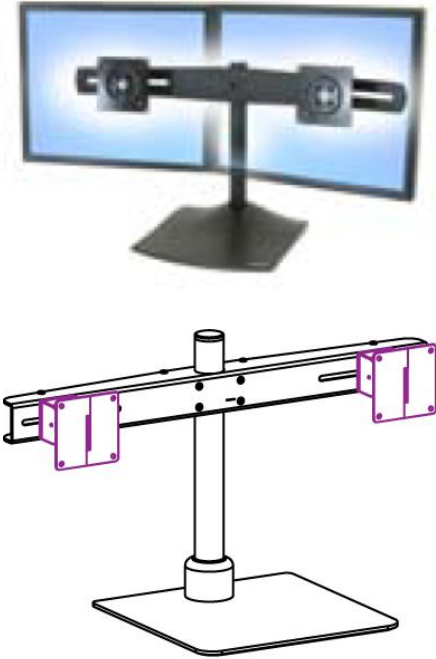

The ‘484 patent describes a cable routing duct and discloses that use of a cable routing duct provides for orderly branching and routing of wires, cables and the like. The patent discloses a support arm-style structure that includes a channel within which cables can be disposed.

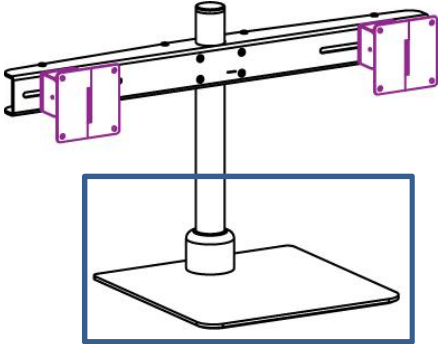



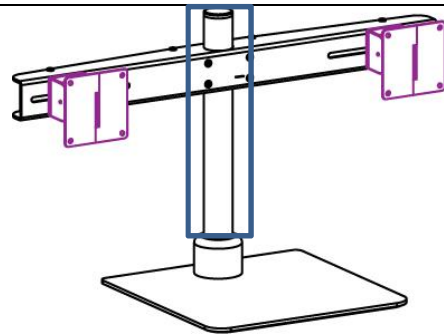

Claim 7	Ergotron DS-100 Product
<p>The display system of claim 1,</p> <p>wherein the at least two connectors includes three connectors and the at least two displays includes three displays,</p>	<p>The DS-100 includes multiple monitor configurations where the at least two connectors includes three connectors and the at least two displays includes three displays.</p>  <p>To the extent the DS-100 does not have at three connectors and three displays, such a feature would have been obvious to a person of skill in the art as merely duplication of parts using known techniques to yield predictable results. For example it would have been obvious to have modified the DS-100 in view of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, and the '153 patent, which disclose display systems with three or more monitors and three or more connectors.</p>
<p>the display system comprising the three displays.</p>	<p>The DS-100 includes multiple monitor configurations where the display system includes three displays.</p> <p>To the extent the DS-100 does not have three displays, such a feature would have been obvious to a person of skill in the art as</p>

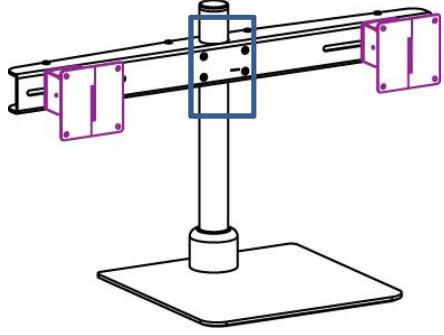

	merely duplication of parts using known techniques to yield predictable results. For example it would have been obvious to have modified the DS-100 in view of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, and the '153 patent, which disclose display systems with three or more monitors and three or more connectors.
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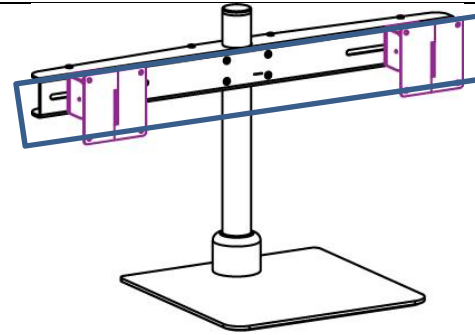
Claim 8	Ergotron DS-100 Product
The display system of claim 1, wherein the support arm is rigid.	<p>The support arm of the DS-100 is rigid.</p> 

Claim 9	Ergotron DS-100 Product
A display system comprising:	<p data-bbox="1066 159 1486 191">The DS-100 is a display system.</p> 
a base for resting on a surface;	<p data-bbox="1066 922 1738 954">The DS-100 includes a base for resting on a surface.</p> 

	 <p>The diagram shows a mechanical assembly. It consists of a square base plate. A vertical support column rises from the center of the base. A horizontal arm is attached to the top of the column. The arm has two rectangular components, one at each end, which are highlighted with purple outlines. A blue rectangular box highlights the base and the lower portion of the support column.</p>
<p>a support column attached to the base and</p>	<p>he DS-100 has a support column connected to the base.</p>  <p>The photograph shows a black mechanical arm assembly. It has a square base plate. A vertical support column rises from the center of the base. A horizontal arm is attached to the top of the column. The arm has two rectangular components, one at each end. A blue rectangular box highlights the base and the lower portion of the support column.</p>

	
<p>having a mounting portion extending in a vertical direction away from the base when the surface is horizontal;</p>	<p>To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting portion is a portion of a support column to which the support arm mounts. The DS-100 has a portion of a support column to which a support arm mounts. The mounting portion extends in a vertical direction away from the base when the surface is horizontal.</p> 

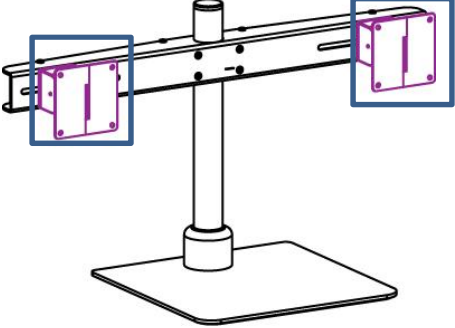

	
<p>a support arm structure secured to the support column, the support arm structure having a support arm that extends on either side of the column, that is substantially horizontal when the base is resting on a horizontal surface and that has a longitudinal length that is longer than the width of the base;</p>	<p>The DS-100 has a support arm structure secured to the support column, the support arm structure having a support arm that extends on either side of the column, that is substantially horizontal when the base is resting on a horizontal surface and that has a longitudinal length that is longer than the width of the base.</p> 

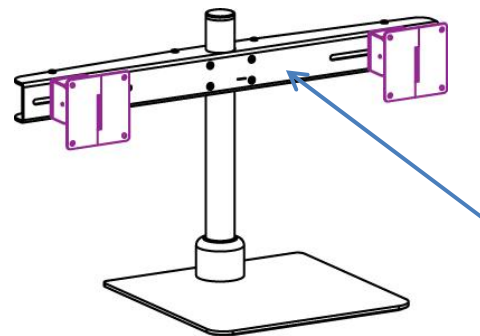


at least two connectors for connecting display housing portions at the backs of at least two displays to the support arm, such that at least a part of the support column is disposed behind the at least two displays,

The DS-100 has at least two connectors for connecting display housing portions at the backs of at least two displays to the support arm, such that at least a part of the support column is disposed behind the at least two displays,



	
<p>wherein: i) the front of the support arm on one side of the support column is bowed, and the front of the support arm on the other side of the support column is bowed so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays,</p>	<p>At least one configuration of the DS-100 is configured so that the front of the support arm on one side of the support column is bowed, and the front of the support arm on the other side of the support column is bowed so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays,</p>  <p>To the extent the DS-100 does not have a front of the support arm on one side of the support column that is bowed, and the front of the support arm on the other side of the support column that is bowed so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays, the DS-100 at least has a straight support arm facing a user.</p>



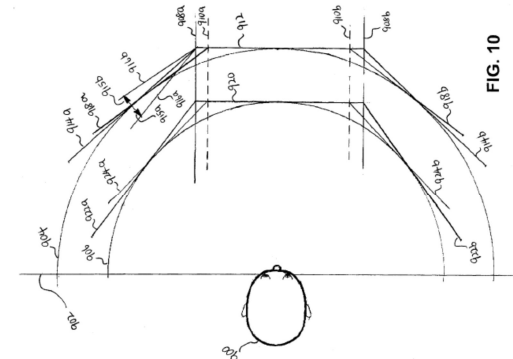
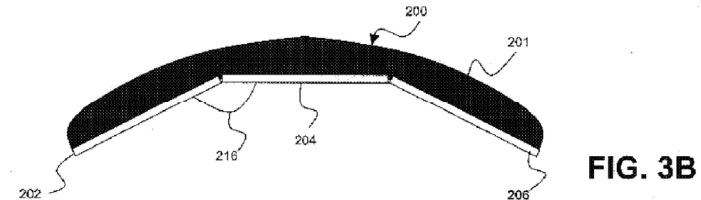
It would have been obvious for a person of ordinary skill in the art to have modified the support arm of the DS-100 such that the front of the support arm on one side of the support column is bowed, and the front of the support arm on the other side of the support column is bowed so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays. Such a modification would have been a mere design choice that would have been obvious according to known methods to yield predictable results. For example, it would have been obvious to have modified the DS-100 in view of one or more of the following secondary references to have the front of the support arm on one side of the support column bowed, and the front of the support arm on the other side of the support column bowed so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays:

Secondary References

(1) The '337 patent

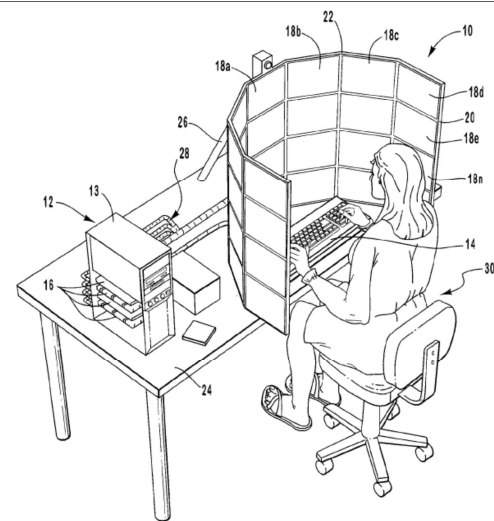
The '337 patent relates to a multi-panel video display system having a plurality of displays that are arranged so the display

panels are substantially equidistant from an eye point of a user. The patent discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays. For example, the display panels are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. (column 2, lines 30-60).



(2) The '328 publication

The '328 publication describes a multi-screen display system that includes a plurality of display screens that are concave in shape about a user. (Abstract). The publication discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.



(3) The '890 patent

The '890 patent discloses a two-dimensional image display device that includes a curved display system wrapping about a user. The patent discloses that the display system is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.

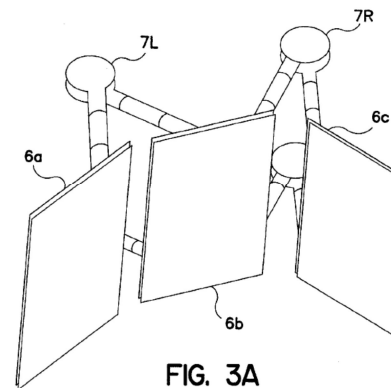
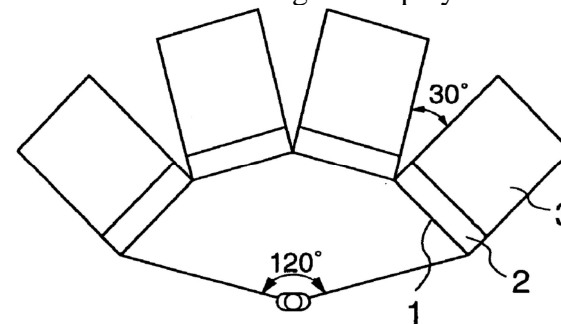
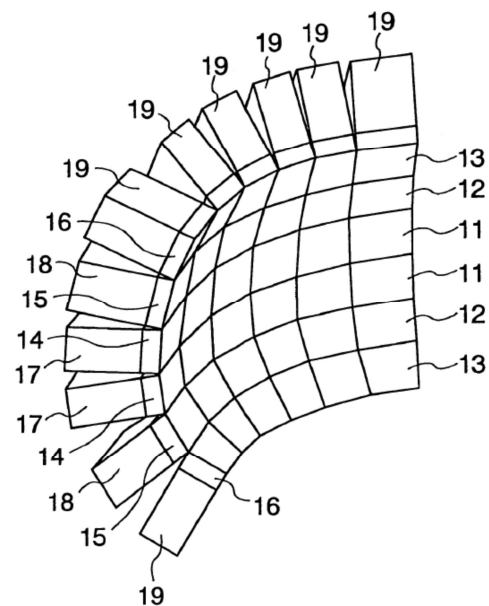


FIG. 3A

(4) The '153 patent

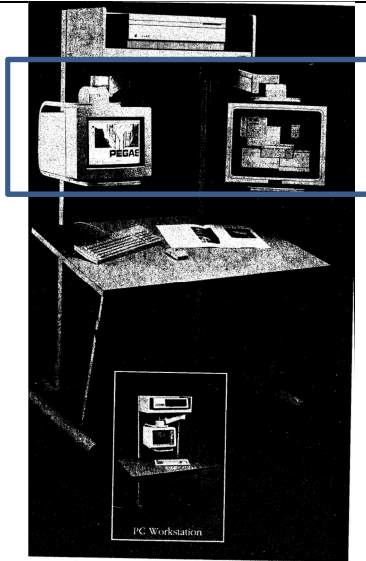
The '153 patent discloses a multi-display apparatus that arranges display devices across a concave surface both in a horizontal visibility angle direction and a vertical visibility angle direction. The patent discloses that the display devices are bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.





(5) The Ergotron Design Station

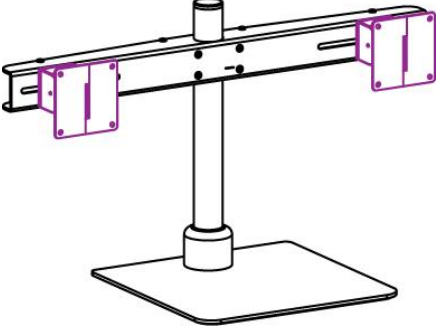

The Ergotron Design Station discloses a display system that has a support arm assembly that is bowed at the front of the support arm assembly so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays.

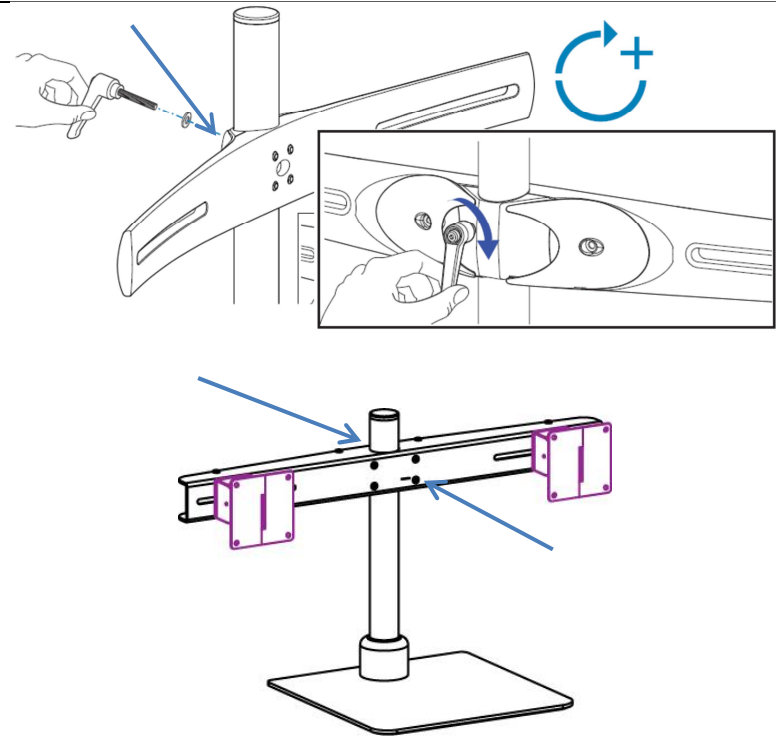


and ii) the support arm is adapted to support most of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm,

The support arm of the DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, and the Ergotron Design Station, is adapted to support most of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm.



	
<p>the support arm structure further comprising a mounting member with a hole and at least one aperture,</p>	<p>To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting member with a hole and at least one aperture is a clamp that goes over a pole and has an opening for a tightening screw. The DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, and the Ergotron Design Station, has a clamp that goes over a pole and has an opening for a tightening screw.</p> 

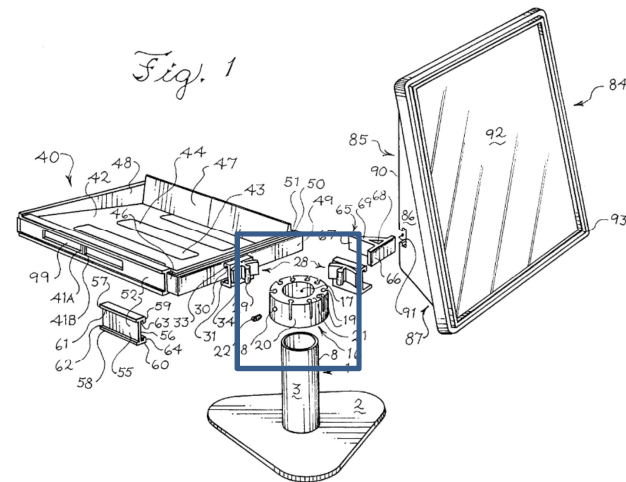


Moreover, to the extent the DS-100 does not have a clamp that goes over a pole and an opening for a tightening screw, such a feature would have been obvious to a person of ordinary skill in the art. For example, it would have been obvious to have modified the DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, and the Ergotron Design Station to include a clamp that goes over a pole and an opening for a tightening screw.

Secondary Reference

US 6,010,017 (hereinafter “the ‘017 patent”)

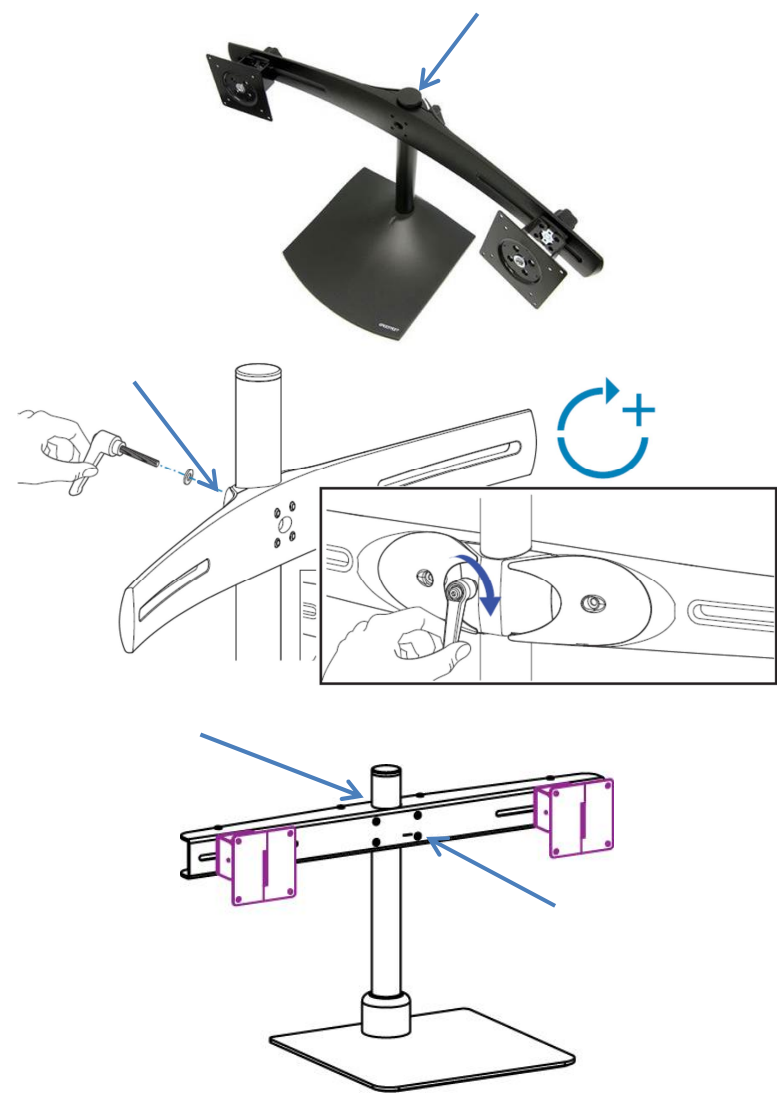
The ‘017 patent describes a display system having a foundational unit. With respect to FIG. 1, the reference describes the foundational unit 1 comprised of a base 2 and column 3. A supporting collar 16 can slip over the column 3 and is mounted to the column by means of a screw.

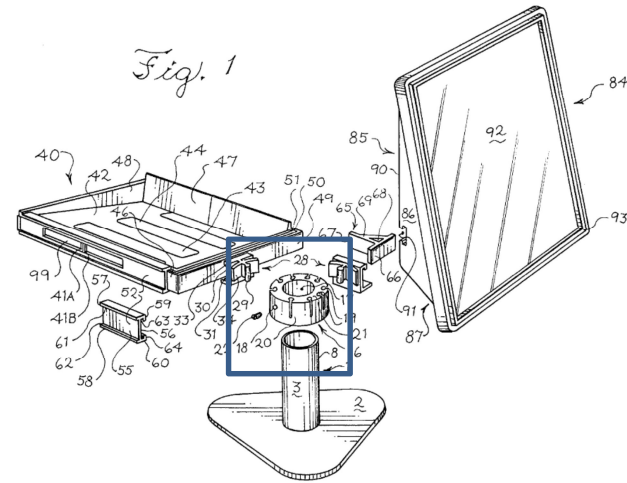


such that the support arm is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and

The support arm structure of the DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the ‘337 patent, the ‘328 publication, the ‘890 patent, the ‘153 patent, the Ergotron Design Station, and the ‘017 patent further includes a mounting member with a hole and at least one aperture (*a clamp that goes over a pole and has an opening for a tightening screw*) such that the support arm is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into

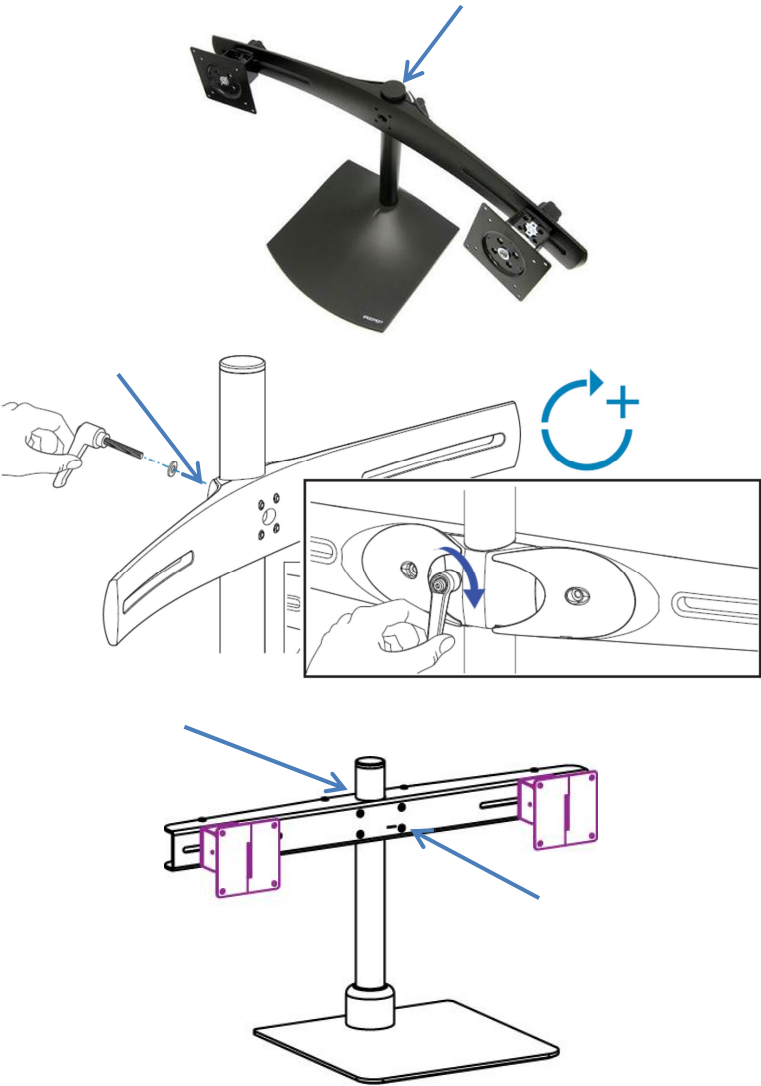
the hole. For example,

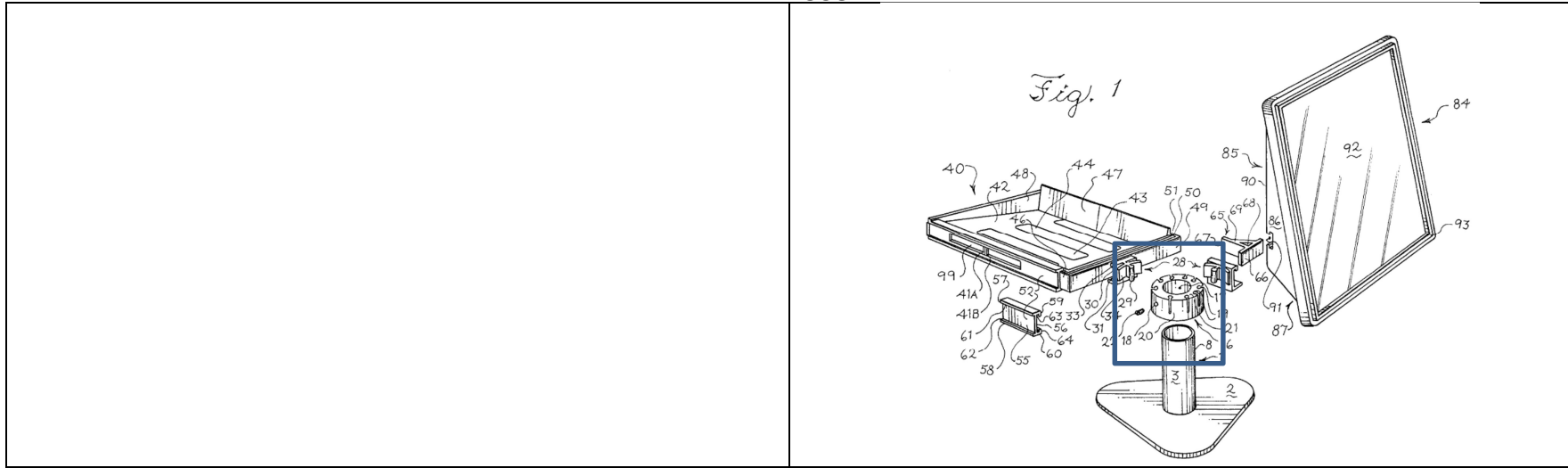





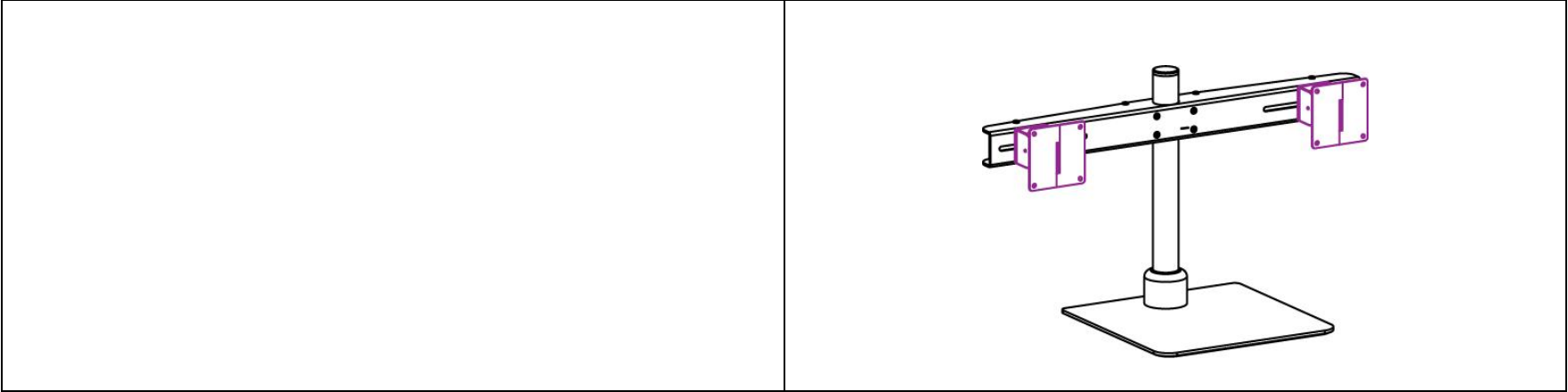
by at least one external fastening element that engages with the at least one aperture.

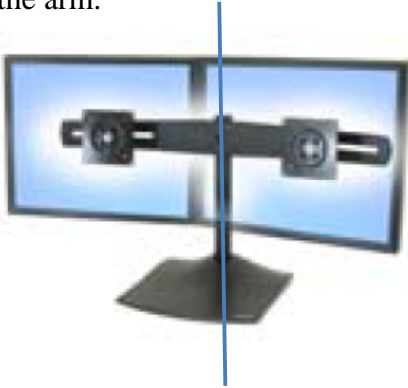
The support arm structure of the DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, and the '017 patent further includes a mounting member with a hole and at least one aperture (*a clamp that goes over a pole and has an opening for a tightening screw*) such that the support arm is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and by at least one external fastening element that engages with the at least one aperture. For example,

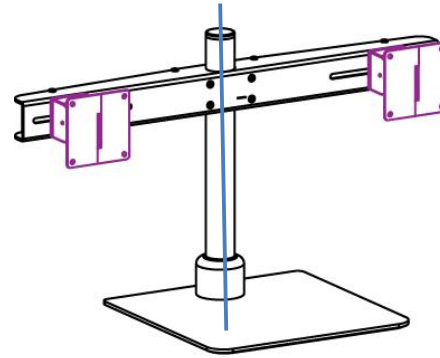




Claim 10	Ergotron DS-100 Product
<p>The display system of claim 9, wherein the support arm supports all of the weight of the displays when the displays are connected to the support arm.</p>	<p>The support arm of the DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, and the '017 patent is adapted to support all of the weight of the displays when the displays are connected to the support arm.</p> 



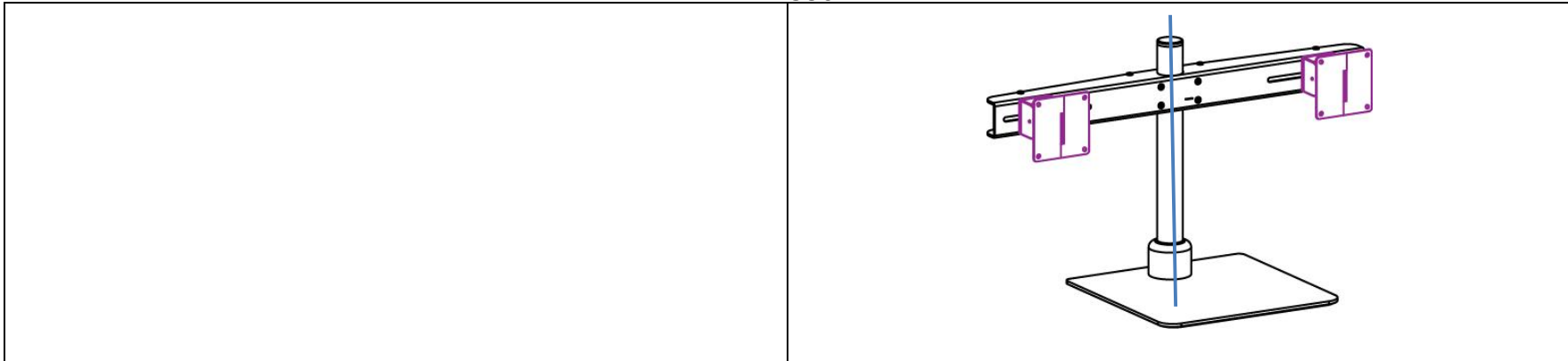
Claim 11	Ergotron DS-100 Product
<p>The display system of claim 10, wherein the support arm has a plane asymmetry perpendicular to the arm,</p>	<p>The support arm of the DS-100 has a plane of symmetry perpendicular to the arm.</p> 




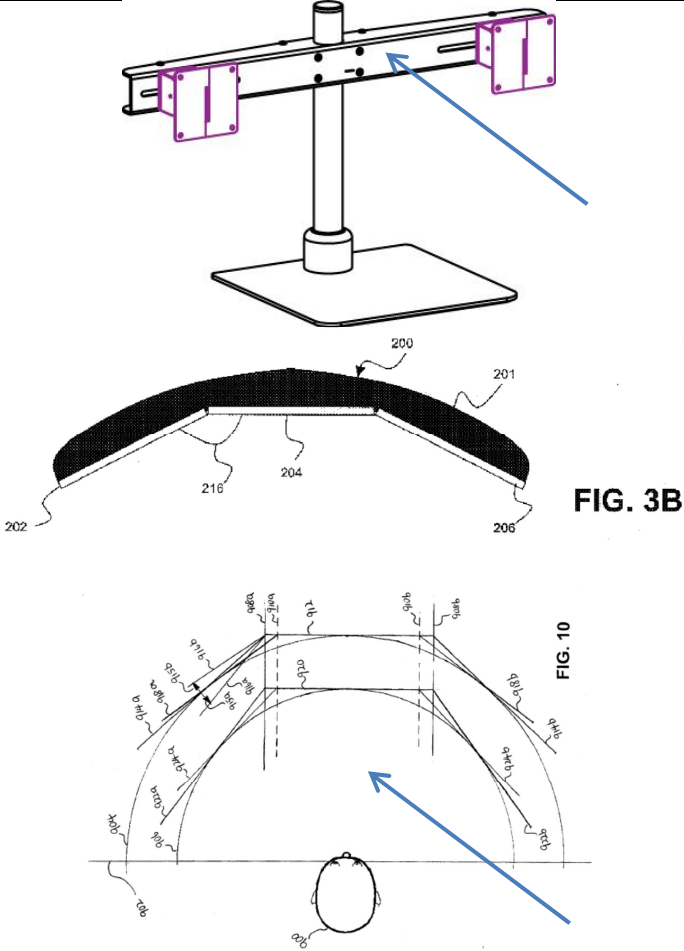
said plane being vertical when the base is resting on a horizontal surface.

The plane of symmetry is vertical when the base is resting on a horizontal surface.

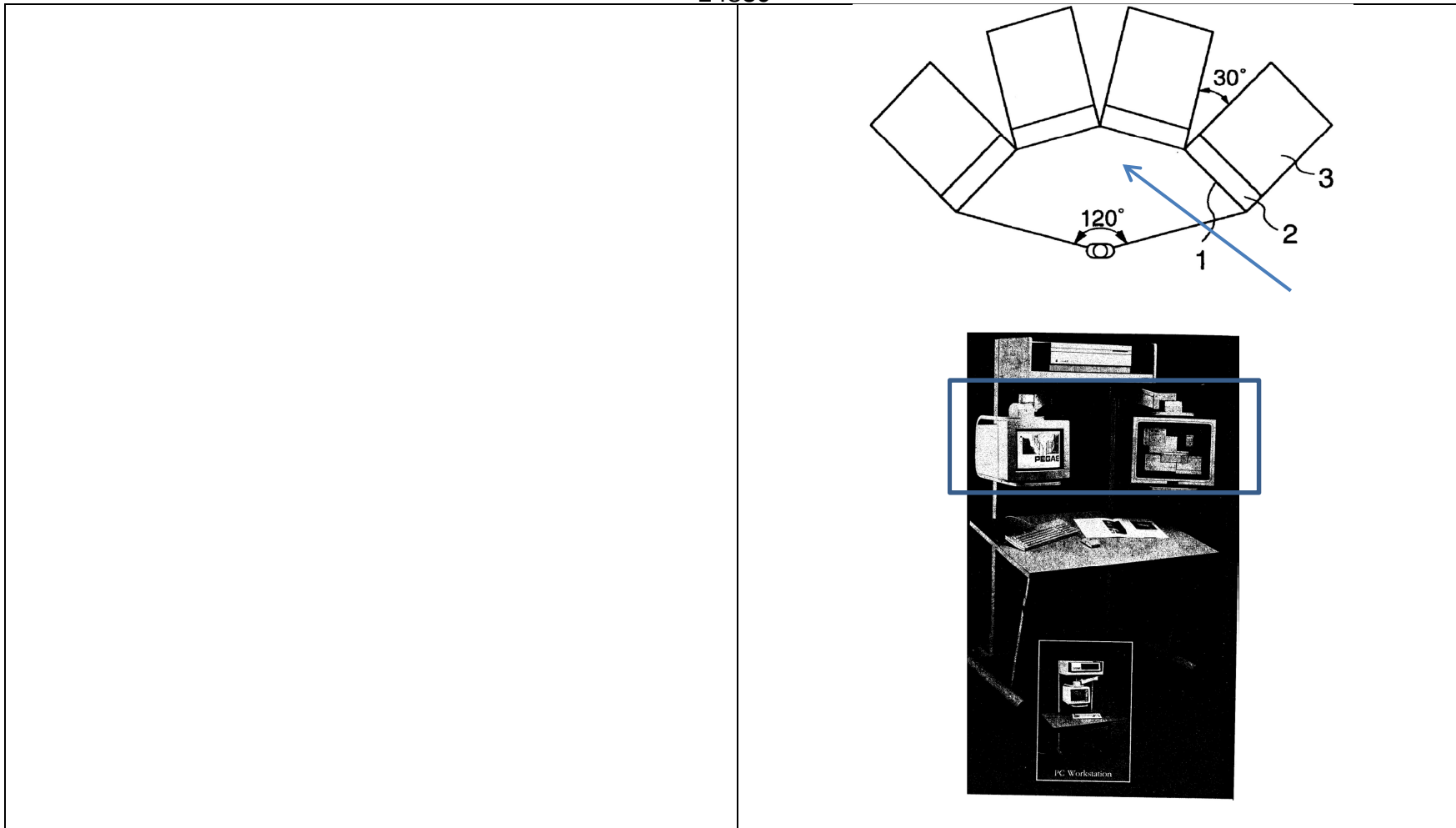




Claim 12	Ergotron DS-100 Product
<p>The display system of claim 10, wherein the bowed part of the support arm describes a smooth curve.</p>	<p>The support arm of the DS-100, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent and the Ergotron Design Station, is configured so the bowed part of the support arm describes a smooth curve.</p> 







Claim 14	Ergotron DS-100 Product
The system of claim 9, wherein the support arm is formed as a single piece component.	The support arm of the DS-100 is formed as a single piece component.